

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

Carolyn Beech, on behalf of herself and the class members described below,)	Case No.: 1:22-cv-00057-HSO-BWR
)	
Plaintiff,)	Judge: Halil S. Ozerden
)	
vs.)	Magistrate Judge: Bradley W. Rath
)	
The Litigation Practice Group, PC,)	
)	
Defendant.)	

UNOPPOSED MOTION FOR WITHDRAWAL OF COUNSEL

Now come attorneys Rebecca Mansell, Matthew Anderson, Christopher Pettit, and Kyle Anderson, counsel of record for Defendants The Litigation Practice Group PC (“LPG”), Jayde Trinh, Vulcan Consulting Group (“Vulcan”), Tony Diab, and Daniel March¹ (collectively, “Defendants”), and for their Unopposed Motion for Withdrawal of Counsel state as follows:

1. The undersigned have previously entered appearances to represent Defendants in the instant case.
2. Defendant LPG is in Chapter 11 bankruptcy proceedings in the United States Bankruptcy Court for the Central District of California (Santa Ana), Case No. 8:23-bk-10571-SC (the “Bankruptcy”).

¹ Daniel March is incorrectly named “Marsh” in the First Amended Complaint.

3. Defendants Trinh, Vulcan, Diab, and March are named as defendants in an adversary proceeding in the Bankruptcy, Case No. 8:23-mp-00102-SC, with claims seeking, *inter alia*, injunctive relief, avoidance, recovery, and alleged fraudulent transfers.

4. Defendants LPG, Diab, and March are named as defendants in Case No. 30-2022-01281911-CU-BC-CXC Superior Court, Orange County, California, captioned *Validation Partners, LLC v. The Litigation Practice Group, PC et al.*

5. Defendants LPG, Diab, and March are named as defendants in Case No. 30-2023-01303355-CU-CO-CXC, Superior Court, Orange County, California, captioned *Debt Validation Fund II, LLC v. The Litigation Practice Group, PC et al.*

6. Defendants LPG, Diab, and March are named as defendants in Case No. Def 30-2022-01297683-CU-BC-CJC, Superior Court, Orange County, California, captioned *All Service Financial, LLC v. The Litigation Practice Group, PC et al.*

7. Defendants Diab, March, and Trinh are named as defendants in Case No. 30-2023-01310785-CU-FR-CJC, Superior Court, Orange County, California, captioned *Business Centers of America Inc. v. Arash Asante Bayrooti et al.*

8. It is in the best interest of Defendants and current counsel that the undersigned attorneys of record move this Court to withdraw from the representation of Defendants in this case.

9. Defendants, therefore, discharge the undersigned attorneys from further representation of Defendants.

10. Defendants Diab, March, and Trinh are former employees, officers, and/or representatives of Defendant LPG.

11. Due to recent allegations and testimony in the above-referenced Bankruptcy proceedings, there exists a conflict of interest inherent in the continued representation of Defendants.

12. The undersigned attorneys' continued representation of Defendants adversely affects the attorneys' relationships with the other Defendants, and Defendants do not consent to continued representation.

13. In addition, due to the Bankruptcy, there exist concerns about whether Defendants can reasonably afford the mounting legal fees, as the available resources are now very limited, and there is already a significant outstanding balance owed to the undersigned attorneys.

14. Defendants have been made aware of the undersigned attorneys' intent to file the instant motion and have not expressed an opposition.

15. The undersigned attorneys cannot zealously and adequately represent Defendants in this case due to the reasons stated herein.

16. If this Motion is granted, no party will not suffer a material adverse effect. Discovery has not yet begun on the First Amended Complaint.

17. Defendants Diab, March, and Trinh will proceed in this case *pro se* upon the granting of this Motion.

18. Defendants March and Trinh are actively licensed attorneys.

19. Defendant Diab is a former attorney who is no longer actively licensed.

20. As this case is still pending before this Court, the undersigned attorneys now move this Court to allow Rebecca Mansell, Matthew Anderson, Christopher Pettit, and Kyle Anderson, and their respective law firms, Rolfes Henry, Co. LPA and Luper Neidenthal & Logan LPA, to

withdraw as counsel of record for Defendants The Litigation Practice Group PC, Jayde Trinh, Vulcan Consulting Group, Tony Diab, and Daniel March.

21. A proposed order accompanies the Motion.
22. Accompanying this Motion is a certification from Defendants that they agree with the withdrawal of the undersigned attorneys.
23. Plaintiff does not object to this Motion.

Respectfully submitted,

/s/ Rebecca J. Mansell

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and

/s/ Christopher R. Pettit

/s/ Matthew T. Anderson

/s/ Kyle T. Anderson

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*Withdrawing Attorneys for Defendants The
Litigation Practice Group PC, Jayde Trinh,
Vulcan Consulting Group, Tony Diab, and
Daniel March*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been filed via the Court's electronic filing system on this 30th day of June, 2023. Notice of filing to counsel of record will be performed by the Court's electronic filing system, and Parties may access the document through the Court's electronic filing system.

/s/ Rebecca J. Mansell
Rebecca J. Mansell, Esq. (MSB 9778)
Withdrawing Attorney for Defendants

The undersigned further certifies that the foregoing has been served this 30th day of June 2023, by electronic mail on Defendants The Litigation Practice Group PC, Jayde Trinh, Vulcan Consulting Group, Tony Diab, and Daniel March.

/s/ Matthew T. Anderson
Matthew T. Anderson – PHV (OH: 0082730)
Withdrawing Attorney for Defendants